

Josiah Contarino JContarino@dhillonlaw.com

July 18, 2022

VIA CF/ECF

Hon. Jessica S. Allen United States Magistrate Judge Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, New Jersey 07101

> Re: Jorge Lopez-Henriquez v. Diamond Foundry, Inc. Case No. 2:22-cy-4267-W.IM-JSA

Dear Judge Allen:

I represent Defendant Diamond Foundry, Inc. ("Defendant") in the above-referenced matter. I write to request *pro hac vice* admission for John-Paul S. Deol, Esq., an attorney from the San Francisco office of Dhillon Law Group Inc. Enclosed are copies of the following in support of this application.

- 1. Application for Leave to Appear and Practice Pro Hac Vice;
- 2. Declaration of John-Paul S. Deol; and
- 3. Proposed Order.

Counsel for Plaintiff Jorge Lopez-Henriquez has advised that he consents to this Application. Accordingly, Defendant has not filed a formal motion. If this Application meets Your Honor's approval, Defendant respectfully requests that Your Honor enter the Proposed Order and return it to the parties via CM/ECF. Thank you for the Court's consideration of this matter.

Respectfully submitted,

DHILLON LAW GROUP, INC.

By: <u>/s/ Josiah Contarino</u>
Josiah Contarino

IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JORGE LOPEZ-HENRIQUEZ,)
DI)
Plaintij	j,)
V.)
) Case No. 2:22-cv-4267
DIAMOND FOUNDRY, INC.,)
Defend	ant.)
)

APPLICATION FOR LEAVE TO APPEAR AND PRACTICE PRO HAC VICE

Pursuant to Rule 101.1(c) of the Local Rules of Practice of the United States District Court for the District of New Jersey, the undersigned member in good standing of the bar of this Court hereby moves to permit John-Paul S. Deol, Esq. to appear and practice *pro hac vice* in the above-captioned matter on behalf of Defendant Diamond Foundry, Inc. ("Defendant").

In accordance with Local Rule 101.1(c), undersigned counsel states as follows:

- 1. Undersigned counsel is a member in good standing of the bar of this Court.
- 2. John-Paul S. Deol, Esq. is retained counsel for Defendant. He is a partner of the law firm Dhillon Law Group Inc., which is based in San Francisco, California.
- 3. Mr. Deol has been admitted to practice law in the following states and before the following courts:

State Bar of California (No. 284893) Admitted 2012 Main Office 180 Howard Street San Francisco, CA 94105 State Bar of Washington (No. 57617) Admitted 2021 Washington State Bar Association 1325 Fourth Avenue, Suite 600 Seattle, Washington 98101

State Bar of Texas (No. 24127469) Admitted 2022 Texas Law Center 1414 Colorado Street Austin, Texas 78701

New York State Unified Court System (Bar No. 5885991) Admitted 2022 Office of Court Administration Attorney Registration Unit 25 Beaver Street, Room 840 New York, New York 10004

United States District Court for the Central District of California Admitted 2013 Kiry K. Gray, District Court Executive 350 W. 1st Street, Suite 4311 Los Angeles, California 90012

United States District Court for the Northern District of California Admitted 2014 Mark B. Busby, Clerk of Court 450 Golden Gate Avenue, 16th Floor San Francisco, California 94102

United States District Court for the Southern District of California Admitted 2015 Angela D. Caesar, Clerk of Court 333 Constitution Avenue N.W., Room 1225 Washington D.C. 20001

United States District Court for the Eastern District of California Admitted 2016 Angela D. Caesar, Clerk of Court 333 Constitution Avenue N.W., Room 1225 Washington D.C. 20001 United States District Court for the District of Colorado Admitted 2018 Jeffrey P. Colwell Esq., Clerk of Court Alfred A. Arraj US Courthouse, Room A105 901 19th Street Denver, Colorado 80294

United States Court of Appeals for the Ninth Circuit Admitted 2014 Molly C. Dwyer, Clerk of Court 95 7th Street San Francisco, California 94103

- 4. Mr. Deol has never been the subject of disciplinary proceedings in any jurisdiction, nor are any disciplinary proceedings currently pending.
- 5. Mr. Deol has never had a previous *pro hac vice* admission denied or revoked for misconduct (by this Court or others).
- 6. Mr. Deol has read and agreed to comply with the Local Rule 101.1(c) of the United States District Court for the District of New Jersey.
- 7. The undersigned counsel, Josiah A. Contarino, Esq., is an attorney with the law firm Dhillon Law Group Inc. in its New Jersey office, and has filed an appearance in this action.
- 8. A supporting declaration from Mr. Deol is attached to this application as Exhibit A.

[continued on following page]

WHEREFORE, Defendant Diamond Foundry, Inc., by and through undersigned counsel, respectfully requests the Court to grant leave to allow John-Paul S. Deol, Esq. to appear and practice *pro hac vice* in the above-captioned matter before this Court.

Dated: July 18, 2022

Respectfully submitted,

DHILLON LAW GROUP, INC. A CALIFORNIA PROFESSIONAL CORPORATION

By: /s/Josiah Contarino JOSIAH CONTARINO

50 Park Place – Suite 1105 Newark, NJ 07102 973-298-1723 jcontarino@dhillonlaw.com Attorney for Defendant Diamond Foundry Inc.

IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JORGE LOPEZ-HENRIQUEZ,)
Plaintiff,)
v.)
) Case No. 2:22-cv-4267
DIAMOND FOUNDRY, INC.,)
Defendant.)

DECLARATION OF JOHN-PAUL S. DEOL IN SUPPORT OF APPLICATION FOR LEAVE TO APPEAR AND PRACTICE PRO HAC VICE

- I, John-Paul S. Deol, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- 1. I am over the age of eighteen (18) years, and I have personal knowledge of the matters contained in this declaration. If called to testify, I could do so competently and in conformity with the facts set forth in this declaration.
- 2. I make this declaration in support of the application filed by Defendant Diamond Foundry, Inc. ("Defendant") for leave to enable me to appear and practice *pro hac vice* in the above-captioned case before this Court.
- 3. I am retained counsel for Defendant. I am a partner of the law firm Dhillon Law Group Inc., which is based in San Francisco, California.
- 4. I have been admitted to practice law in the following states and before the following courts:

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State Bar of California (No. 284893) Admitted 2012 Main Office 180 Howard Street San Francisco, CA 94105

State Bar of Washington (No. 57617) Admitted 2021 Washington State Bar Association 1325 Fourth Avenue, Suite 600 Seattle, Washington 98101

State Bar of Texas (No. 24127469) Admitted 2022 Texas Law Center 1414 Colorado Street Austin, Texas 78701

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United States Court of Appeals for the Ninth Circuit Admitted 2014 Molly C. Dwyer, Clerk of Court 95 7th Street San Francisco, California 94103

- 5. I have never been the subject of disciplinary proceedings in any jurisdiction, nor are any disciplinary proceedings currently pending.
- 6. I have never had a previous *pro hac vice* admission denied or revoked for misconduct (by this Court or others).
- 7. I have read and agreed to comply with the Local Rule 101.1(c) of the United States

 District Court for the District of New Jersey.

I declare under penalty of perjury that the foregoing information is true and correct, and that this declaration was executed by me on July 18, 2022.

Dated: July 18, 2022

/s/John-Paul S. Deol JOHN-PAUL S. DEOL

IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JORGE LOPEZ-HENRIQUEZ,)
Plaintiff,)))
v.) Case No. 2:22-cv-4267-WJM-JSA
DIAMOND FOUNDRY, INC.,) ORDER ADMITTING COUNSEL PRO HAC VICE
Defendant.) TROTAC VICE))

THIS MATTER having come before the Court upon the Application of Defendant Diamond Foundry, Inc. ("Defendant") for an Order granting admission *pro hac vice* to John-Paul S. Deol, Esq., and the Court having read and reviewed the supporting papers filed in support of the requested relief; having read and reviewed all papers submitted in opposition and reply thereto, if any; and the Court having heard the arguments of counsel, if any; and good cause appearing therefor

IT IS on this _____ day of _____ 2022, ORDERED and ADJUDGED as follows:

- 1. ORDERED that pursuant to Local Civil Rule 101.1(c) of the United States District Court for the District of New Jersey, John-Paul S. Deol, Esq. is hereby admitted *pro hac vice* in the above-captioned matter;
 - **2. IT IS FURTHER ORDERED** that John-Paul S. Deol, Esq. shall:
 - a. Remain associated in this matter with Josiah Contarino, Esq., who is an attorney duly admitted to and in good standing with the Bars of New Jersey and the United States District Court for the District of New Jersey, or another attorney from the

- New Jersey office of Dhillon Law Group Inc., who is licensed to practice in the United States District Court for the District of New Jersey;
- b. Abide by the Rules of Practice of the United States District Court for the District of New Jersey, including all disciplinary rules as set forth in Local Civil Rule 101.1, et seq.;
- c. Notify the Court immediately of any matters affecting his standing at the Bar of any other Court; and
- d. Have all pleadings, briefs, and other papers filed with the Court signed by Josiah Contarino, Esq., or another attorney from the New Jersey office of Dhillon Law Group Inc., who shall be responsible for those pleadings, briefs, and other papers and for the conduct of the admitted attorneys herein; and

3. IT IS FURTHER ORDERED that John-Paul S. Deol, Esq. shall:

- a. Make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a) and Local Civil Rule 101.(c)(2) for any year in which he represents a client in a matter pending before this Court; and
- b. Make payment of \$150.00 to the Clerk, United States District Court for the District of New Jersey to appear *pro hac vice* as provided in Local Civil Rule 101.1(c)(3).